

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DIVISION)

NANCY CAVE

Plaintiff

v.

THE WINDERMERE GROUP, L.L.C.

Defendant

Civil Action No.: 02 CV 825 WDQ

**CERTIFICATION OF GOOD FAITH  
ATTEMPT TO RESOLVE DISCOVERY DISPUTE**

In accordance with Local Rule 104.7, I, Theresa M. Connolly, hereby certify that as counsel for the Defendant, I have made numerous attempts to obtain responses to Defendant's outstanding discovery requests. Specifically, Defendant served its First Set of Interrogatories and Request for Production of Documents upon Plaintiff on February 3, 2003. Responses were due on or before March 5, 2003. I agreed to give Plaintiff's counsel additional time to respond to Defendant's discovery requests on March 3, 2003. Plaintiff did not timely respond. I sent Plaintiff's counsel further correspondence on March 31, 2002 requesting the tardy discovery responses. Insufficient responses were served in early April of 2003. On April 11, 2003 my colleague, Karen Gray, communicated with Plaintiff's counsel regarding the outstanding discovery responses. Ms. Gray informed Plaintiff's counsel that if he failed to serve proper discovery responses by the close of business on April 14, 2003, Windermere would be forced to

file a motion to compel. To date, Plaintiff's counsel has not adequately responded to Defendants' discovery requests.

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Theresa M. Connolly  
Counsel for Defendant The Windermere Group, L.L.C.